


201-14384

 NCIC HPV  
Sent by: Mary-Beth  
Weaver  
04/02/2003 01:07 PM

To: NCIC HPV, moran.matthew@epa.gov  
cc:  
cc:  
Subject: Request to Delist 1,2,3,4-Tetrachlorobenzene (CAS # 634-66-2) and  
1,2,4,5-Tetrachlorobenzene (CAS # 95-94-3) from the HPV Chemical  
List



Ed Kordoski <Kordoski@SOCMA.com> on 04/01/2003 04:38:02 PM

To: oppt.ncic@epamail.epa.gov, Rtk Chem/DC/USEPA/US@EPA  
cc: "Frederick R. Johnnsen" <frjoha@solutia.com>, Heather Burleigh-Flayer <burleighflayer@ppg.com>, Jim  
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Volkenburg <susan.vanvolkenburg.b@bayer.com>, Jessica Ross <Rossj@SOCMA.com>

Subject: Request to Delist 1,2,3,4-Tetrachlorobenzene (CAS # 634-66-2) and 1,2,4,5-Tetrachlorobenzene (CAS #  
95-94-3) from the HPV Chemical List

Chlorobenzene Producers Association

1850 M Street NW

Suite 700

Washington, DC 20036-5810

Phone: (202) 721-4145

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April 1, 2003

Christine Todd Whitman, Administrator  
U.S. Environmental Protection Agency  
Post Office Box 1473  
Merrifield, VA 22116

Attn: Chemical Right-to-Know Program; HPV Challenge Program

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**Request to Delist 1,2,3,4-Tetrachlorobenzene (CAS # 634-66-2) and  
1,2,4,5-Tetrachlorobenzene (CAS # 95-94-3)**

The Synthetic Organic Chemical Manufacturers Association's (SOCMA) Chlorobenzene Producers Association (CPA) is comprised of Bayer Corporation; PPG Industries, Inc.; and Solutia Inc. Up until May of 2002, Metachem Products, LLC was also a member. At that time last year they declared bankruptcy and the site was "officially" secured by EPA.

As the major producers and importers of chlorobenzene chemicals in the United States, the members of CPA committed to the EPA High Production Volume (HPV) Challenge Program. CPA completed and submitted robust summaries and a test plan for a chlorobenzenes category. The chlorobenzenes category consisted of four chlorinated benzenes: monochlorobenzene (CAS # 108-90-7), 1,2-dichlorobenzene (CAS # 95-50-1), 1,3-dichlorobenzene (CAS # 541-73-1), and 1,2,3-trichlorobenzene (CAS # 87-61-6).

After comments by the EPA on November 7, 2002, and our response on February 6, 2003, the Agency agreed that the relatively complete matrix of SIDS data elements and results of biological and toxicological studies along with a very consistent pattern of structural and physicochemical properties clearly indicates that a Chlorobenzenes Category is justified and that no additional testing is required.

When CPA committed to the EPA HPV Challenge Program on November 23, 1999, they did not volunteer for either 1,2,3,4-tetrachlorobenzene (CAS # 634-66-2) or 1,2,4,5-tetrachlorobenzene (CAS # 95-94-3). These two chemicals became part of the EPA's HPV Program because either 1 million pounds of these two were produced and/or imported based on a 1990 list of produced chemicals. In 1999 when CPA committed to the HPV Program these two chemicals were not being produced and/or imported into the United States by CPA's member companies. It may be possible that some trace amounts of these two chemicals are generated as impurities in the production of other chlorobenzenes, but would be orders of magnitude less than 1 million pounds.

As stated above, CPA represents the major producers and importers of chlorobenzene chemicals in the United States. **We therefore "officially" ask the U.S. Environmental Protection Agency to remove or delist both 1,2,3,4-tetrachlorobenzene (CAS # 634-66-2)**

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**and 1,2,4,5-tetrachlorobenzene (CAS # 95-94-3) from their HPV Challenge Program list of chemicals, since they do not fit the criteria for inclusion and have not done so for over a decade.**

Please contact me at (202) 721-4145 if there are any questions relating to this submission.

Sincerely,

Edward W. Kordoski, MBA, Ph.D.

Executive Director, Chlorobenzene Producers Association

cc: CPA Group Members